

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

STIPULATION AND ORDER

WHEREAS Alonso Del Val-Echeverria, in his capacity as Foreign Representative of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V. (together, the “Debtors”), filed a motion (ECF 111, the “Motion”)¹ for the entry of an order pursuant to Sections 105(a) and 1521(a)(4) of the Bankruptcy Code and Rule 2004 of the Federal Rules of Bankruptcy Procedure authorizing the Foreign Representative to obtain discovery from, *inter alia*, Seadrill Limited (“Seadrill”) and Fintech Advisory Inc. (“Fintech”); and

WHEREAS, the Court entered an Order granting the Foreign Representative’s request to take discovery, including by serving deposition subpoenas, on Seadrill and Fintech (ECF 156); and

WHEREAS, the Foreign Representative filed a letter with the Court on April 16, 2019 (ECF 186) and Seadrill and Fintech responded on April 17, 2019 (ECF 187); and

WHEREAS, the Court held a telephonic conference to address the issues raised in those letters on April 17, 2019.

¹ Capitalized terms used and not otherwise defined herein shall have the meanings set forth in the Motion and the Foreign Representative’s *Verified Petition for Recognition of a Foreign Main Proceeding and Granting Discretionary Relief* (ECF 2).

Based on the foregoing, it is hereby STIPULATED, AGREED, AND ORDERED AS FOLLOWS:

1. Fintech shall produce its corporate designee, Christian Whamond, for a deposition pursuant to Rule 30(b)(6) on May 15, 2019 at 10:00 AM at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, located at 51 Madison Avenue, Floor 22, New York, New York, 10010; and
2. Seadrill shall produce its corporate designee, Anton Dibowitz, for a deposition pursuant to Rule 30(b)(6) on May 16, 2019 at 10:00 AM at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, located at 51 Madison Avenue, Floor 22, New York, New York, 10010; and
3. Unless it would violate applicable law, the provisions of this Stipulation and Order shall remain effective and binding on the Foreign Representative, Seadrill, and Fintech notwithstanding conversion of the Foreign Main Proceeding from a restructuring to a liquidation; and
4. This Stipulation and Order shall be effective immediately upon its entry and the requirements of Bankruptcy Rule 6004(h) are waived; and
5. The Court shall retain jurisdiction with respect to the enforcement, amendment, modification, or implementation of this Stipulation and Order.

Dated: April 22, 2019
New York, New York

WILK AUSLANDER LLP

/s/ Jay S. Auslander

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Attorneys for Seadrill Limited and Fintech Advisory Inc.

Dated: April 22, 2019
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Attorneys for the Foreign Representative

ENTERED this 22nd day of April, 2019

SO ORDERED:

/S/ Shelley C. Chapman

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE